

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

|                                 |       |                                   |
|---------------------------------|-------|-----------------------------------|
| <b>UNITED STATES OF AMERICA</b> | *     | <b>CRIMINAL DOCKET NO. 08-294</b> |
| <b>v.</b>                       | *     | <b>SECTION: F</b>                 |
| <b>VERNON THOMPSON</b>          | *     | <b>VIOLATION: 18 U.S.C. 641</b>   |
|                                 | *     |                                   |
|                                 | * * * |                                   |

**F A C T U A L   B A S I S**

The Defendant, **VERNON THOMPSON** (hereinafter, “Thompson”), has agreed to plead guilty as charged to the one-count bill of information charging him with theft of government money, in violation of Title 18, United States Code, Section 641.

Should this matter have gone to trial, the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the indictment now pending against the defendant:

The Social Security Administration (“SSA”) is, and was, at the time of the offense, an agency or department of the United States of America empowered with duties including, but not limited to, determining eligibility for social security benefits and providing and administering

such benefits under Title II of the Social Security Act. The Commissioner of Social Security is the Head of the SSA.

**DEFENDANT THOMPSON'S** wife, T.S., was an SSA beneficiary who died on May 28, 2006. **DEFENDANT THOMPSON**, who had resided with T.S. prior to her death, continued to reside at that address after T.S.'s death. SSA continued to deposit T.S.'s monthly benefits into T.S.'s checking account until December 31, 2007. At no time during that period did Defendant Thompson inform the Commissioner, or any other SSA employee, of T.S.'s death.

From on or about May 28, 2006, through December 2007, **DEFENDANT THOMPSON**, knowing that T.S. had passed away, accessed and withdrew money deposited into T.S.'s checking account by SSA on a regular basis, using her ATM card and PIN, resulting in a total loss to the government of \$12,334.00. **DEFENDANT THOMPSON** has cooperated with Secret Service agents since the inception of this investigation. By engaging in the behavior outlined above, **DEFENDANT THOMPSON** did knowingly embezzle, steal, purloin, and convert SSA benefits to which he knew he was not entitled.

The above facts come from an investigation conducted by Secret Service agents and the admissions of the defendant, **VERNON THOMPSON**.

The above facts would have been proven beyond a reasonable doubt by credible testimony of Secret Service agents, other SSA employees, documents and records of SSA, copies of deposit statements, and **DEFENDANT THOMPSON'S** own confession to Secret Service agents.

**APPROVED AND ACCEPTED:**

---

|                 |      |
|-----------------|------|
| VERNON THOMPSON | Date |
| Defendant       |      |

---

|                                 |      |
|---------------------------------|------|
| CYNTHIA CIMINO                  | Date |
| (LA Bar No. 30874)              |      |
| Attorney for Defendant Thompson |      |

---

|                                  |      |
|----------------------------------|------|
| SPIRO G. LATSIS                  | Date |
| (LA Bar. No. 24517)              |      |
| Assistant United States Attorney |      |